

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
BID PROTEST**

AMAZON WEB SERVICES, INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA,  
by and through the U.S. Department of Defense,

Defendant,

and

MICROSOFT CORPORATION,

Defendant-Intervenor.

Case No. 19-cv-01796

Judge Campbell-Smith

**FINAL REDACTED VERSION**

**PLAINTIFF AMAZON WEB SERVICES, INC.'S  
MOTION TO COMPLETE THE ADMINISTRATIVE RECORD**

Pursuant to Rule 7 and Appendix C of the Rules of the Court of Federal Claims, Plaintiff Amazon Web Services, Inc. ("AWS") respectfully requests that the Court direct Defendant to complete the administrative record ("AR") in the above-captioned bid protest.

As set forth more fully in the accompanying Memorandum of Points and Authorities in Support, the compendium of documents that the Government submitted as the AR is incomplete as presented. That compendium is missing whole categories of information that DoD generated and considered during the course of its procurement decision, and omits materials that this Court expressly required to be included in the AR. Without completing the AR through the inclusion of the missing materials set forth in the accompanying Memorandum of Points and Authorities in Support, the Government's AR is incomplete and cannot be relied upon by the Court to facilitate

meaningful and effective judicial review. Accordingly, AWS respectfully requests the Court GRANT this Motion.

Defendant, the United States, and Defendant-Intervenor, Microsoft Corporation, oppose this motion, and have stated they will file their responses in accordance with the Court's rules.

Dated: January 20, 2020

Respectfully submitted,

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